

EXHIBIT 2

Kurt Nickerson

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUSTIN O'CONNOR, ET AL, ON
BEHALF OF HIMSELF AND
ALL OTHERS SIMILARLY SITUATED,
Plaintiffs,

vs

Case No. 1:19-CV-05045

FORD MOTOR COMPANY,
Defendant.

_____/

The Videotaped Deposition of KURT NICKERSON
Taken at The Henry Ford
300 Town Center Drive
Dearborn, Michigan 48126
Commencing at 9:30 a.m.
Tuesday, October 25, 2022
Before Robin D. Gadwa, CSR 2607, RPR, FPR, FAPR

Kurt Nickerson

21 BY MR. BREIT:

22 Q Mr. Nickerson, before we get to documents, uhm, I
23 wanted to ask you about the 10R80 collaboration with
24 GM. Were you aware of that?

25 MS. KELLY: Objection.

Kurt Nickerson

1 A Yes.

2 BY MR. BREIT:

3 Q And how did that come about?

4 A I'm not privy to the origins of that deal. But I know
5 higher levels within the two companies were talking
6 about a collaboration on multiple transmission
7 programs. So, the deal was structured such that Ford
8 would design the 10R80 and provide that design to
9 General Motors. General Motors would design a 9-speed
10 front wheel drive transmission and provide that design
11 to Ford.

12 Q So it was, if I understand you correctly, there was an
13 understanding at some level that Ford would do a
14 design and give that design to GM; GM would do a
15 separate design and give that to Ford?

16 A Yes.